

SURROGATE'S COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

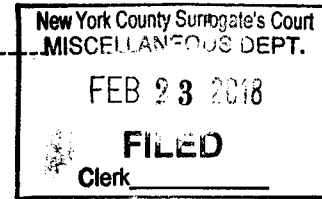
In the Matter of DALIA GINGER, trustee of the OLR Y
GINGER 1993 TRUST,

Petitioner,

-against-

ORLY GINGER, ARIE GINGER, GLENCOVA INVESTMENT
COMPANY, TR INVESTORS, LLC, NEW TR EQUITY I, LLC,
NEW TR EQUITY II, LLC, TRANS-RESOURCES, INC, ARNOLD
BROSER, DAVID BROSER, JOHN DOES 1-20 AND JANE
DOES 1-20,

Respondents.



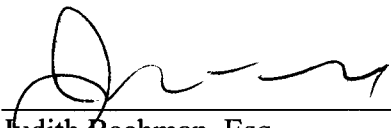
File No. 2008-0017E

Hon. Nora S. Anderson

Notice of
Cross-Motion

PLEASE TAKE NOTICE, that upon the Affirmation of Judith Bachman, dated February 20, 2018, the accompanying Memorandum of Law, and all prior pleadings and proceedings heretofore had herein, petitioner Dalia Genger will cross-move this Court, at 31 Chambers Street, New York, New York 10007, Room 509, on February 27, 2018 at 10:00 a.m., or as soon thereafter as counsel can be heard, for an Order pursuant to, inter alia, SCPA §§311, 312, 402, 403, 2106 and CPLR 306(b) for (i) an extension of time to serve process and/or permission to make substituted service (or nunc pro tunc) and to file an affidavit of service, (ii) the appointment of a Guardian ad Litem for Orly Genger's infant daughter and unborn children and the issuance of a supplemental citation, and (iii) to consolidate this turnover proceeding with the removal proceeding also pending in this Court.

Dated: February 20, 2018
New City, New York



Judith Bachman, Esq.
The Bachman Law Firm
254 S. Main Street, Suite 306
New City, New York 10956
845-639-3210

SURROGATE'S COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of DALIA GENDER, trustee of the ORLY
GENDER 1993 TRUST,

Petitioner,

vs.

ORLY GENDER, ARIE GENDER, GLENCOVA
INVESTMENT COMPANY, TR INVESTORS, LLC, NEW
TR EQUITY 1, LLC, NEW TR EQUITY II LLC, TRANS-
RESOURCES, INC, ARNOLD BROSER, DAVID BROSER,
JOHN DOES 1-20 AND JANE DOES 1-20,

Respondents.

File No. 2008-0017E
Hon. Nora S. Anderson

**AFFIDAVIT OF SERVICE
BY PERSONAL DELIVERY**

STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

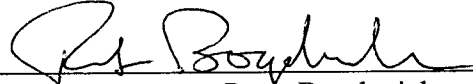
Peter Bogdanich, being duly sworn, deposes and states:

1. I am not a party to this action, and am over 18 years of age.
2. On the 20th day of February, 2018, I served (1) NOTICE OF CROSS-MOTION, (2) AFFIRMATION OF JUDITH BACHMAN IN OPPOSITION, and (3) MEMORANDUM OF LAW IN OPPOSITION TO RESPONDENTS' MOTION TO DISMISS AND IN SUPPORT OF PETITIONER'S CROSS-MOTION upon the following individuals at the following addresses:

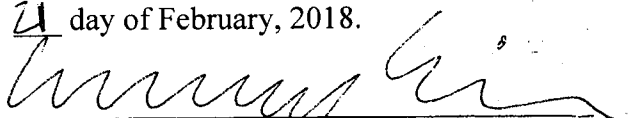
Mitchell D. Goldberg, Esq.
The Freyberg Law Group
950 Third Avenue
32nd Floor
New York, NY 10022

Leon Friedman, Esq.
685 Third Avenue
New York, NY 10017

by delivering true copies thereof, by hand, to the offices above-mentioned.


Peter Bogdanich

Sworn to before me this
21 day of February, 2018.



Notary Public, State of New York
No. 01516322471
Qualified in New York County
Commission Expires 04/06/2019

SURROGATE'S COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

In the Matter of DALIA GENDER, trustee of the OLRV
GENDER 1993 TRUST

Petitioner,

File No. 2008-0017E

-against-

ORLY GENDER, ARIE GENDER, GLENCOVA
INVESTMENT COMPANY, TR INVESTORS, LLC, NEW
TR EQUITY I, LLC, NEW TR EQUITY II, LLC, TRANS-
RESOURCES, INC, ARNOLD BROSER, DAVID
BROSER, JOHN DOES 1-20 AND JANE DOES 1-20,

Hon. Nora S. Anderson

AFFIDAVIT OF SERVICE
BY HAND-DELIVERY

Respondents.

STATE OF NEW YORK)
) SS.:
COUNTY OF NEW YORK)

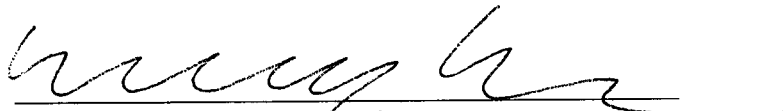
Sammy Simon, being duly sworn, deposes and states:

1. I am not a party to this action, and am over 18 years of age.
2. On the 20th day of February, 2018, I served a (1) NOTICE OF CROSS-MOTION;
(2) AFFIRMATION OF JUDITH BACHMAN TO OPPOSITION; and (3) MEMORANDUM
OF LAW IN OPPOSITION TO RESPONDENTS' MOTION TO DISMISS AND IN SUPPORT
OF PETITIONER'S CROSS-MOTION upon the following individuals at the addresses below:


John Boyle
Skadden, Arps, Slate, Meagher & Flom LLP
Four Times Square
New York, NY 10036-6522

Michael P. Bowen
Kasowitz Benson Torres LLP
1633 Broadway
New York, New York 10019

by delivering true copies thereof, by hand, to the office above-mentioned.


Sammy Simon

Sworn to before me this
21st day of February, 2018.


Notary Public

Peter Eric Bogdanich
Notary Public, State of New York
No. 01BO6366981
Qualified in Nassau County
Commission Expires November 13, 2021

SURROGATE’S COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK
File No.: 2008-0017E

In the Matter of DALIA GENDER, trustee of the OLR
Y GENDER 1993 TRUST,

Petitioner,

-against-

ORLY GENDER, ARIE GENDER, GLENCOVA
INVESTMENT COMPANY, TR INVESTORS, LLC,
NEW TR EQUITY I, LLC, NEW TR EQUITY II, LLC,
TRANS-RESOURCES, INC, ARNOLD BROSER,
DAVID BROSER, JOHN DOES 1-20 AND JANE
DOES 1-20,

Respondents.

NOTICE OF CROSS-MOTION

KELLEY DRYE & WARREN LLP

101 PARK AVENUE
NEW YORK, NEW YORK 10178

(212) 808-7800